

LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York
10165 T: 212.792-0048 • E: Jason@levinepstein.com

October 19, 2023

Via Electronic Filing

The Hon. Marcia M. Henry, U.S.M.J
U.S. District Court, Eastern District of New York
225 Cadman Plaza E.
Brooklyn, NY 11201

Re: *Bermeo Lozado et al v. Centro Glass Corp. et al*
Case No. 1:23-cv-01680-RPK-MMH

Dear Honorable Magistrate Judge Henry,

This law firm represents Plaintiffs Emanuel Bermeo Lozado and Miguel Bermeo Lozado (together, the “Plaintiffs”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules II(B)¹, this letter respectfully serves to request an extension of Plaintiffs’ time to file Plaintiffs’ Motion for Default Judgement from October 19, 2023, to, through and including, November 19, 2023.

This is the fifth request of its nature. If granted, this request would not affect any other scheduled Court appearance or deadline.

The basis of this request is that the undersigned law firm is still in the process of obtaining Plaintiffs’ signatures for the necessary affidavits in support of Plaintiffs’ motion for default judgment. Context is crucial here. Plaintiffs are both blue-collar workers, with limited technological competency. The undersigned law firm is in communication with Plaintiffs, who have advised the undersigned that they are still meaningfully interested in pursuing their wage-theft claims. However, Plaintiffs’ busy work schedules, and technological hurdles, have delayed the signing of their affidavits in support of the contemplated motion for default judgment.

In light of the foregoing, Plaintiffs’ counsel respectfully requests one additional extension of time to file Plaintiffs’ Motion for Default Judgement from October 19, 2023, to, through and including, November 19, 2023. The undersigned recognizes the Court’s limited time and resources. The undersigned sincerely anticipates being in a position to finalize Plaintiffs’ Motion for Default Judgement on or before November 19, 2023.

Thank you, in advance, for your time and attention to this matter.

¹ The undersigned wishes to apologize to the Court for the slight delay in filing the instant application.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi

60 East 42nd Street, Suite 4700

New York, New York 10165

Tel. No.: (212) 792-0048

Email: Jason@levinepstein.com

Attorneys for Plaintiffs

VIA ECF: All Counsel